

Message

From: Spina, Providence [Spina.Providence@epa.gov]
Sent: 9/1/2020 7:56:13 PM
To: Leathers, James [Leathers.James@epa.gov]
CC: Hoyt, Daniel [Hoyt.Daniel@epa.gov]; Lannen, Justin [Lannen.Justin@epa.gov]
Subject: RE: Re: Draft statement on Duration of Continuous Air Monitoring Program

Thanks, James. Sorry to miss the noon timeline, but I think the statement looks fine. **Ex. 5 Attorney Client (AC)**

Ex. 5 Attorney Client (AC)

Providence Spina
202-564-2722

From: Leathers, James <Leathers.James@epa.gov>
Sent: Tuesday, September 01, 2020 7:29 AM
To: Spina, Providence <Spina.Providence@epa.gov>
Cc: Hoyt, Daniel <Hoyt.Daniel@epa.gov>; Lannen, Justin <Lannen.Justin@epa.gov>
Subject: RE: Re: Draft statement on Duration of Continuous Air Monitoring Program

Provi,

If you have any feedback that would be great. Steve T and Justin reviewed already and I will need to send to Corry today, but if you have comments or edits before Noon eastern today, I have time to incorporate them. Thanks

James Leathers
Environmental Engineer
EPA Region 6
Air Toxics Enforcement
Enforcement and Compliance Assurance Division
1201 Elm St., Suite 500, ECDAT
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From: Spina, Providence <Spina.Providence@epa.gov>
Sent: Monday, August 31, 2020 9:19 PM
To: Leathers, James <Leathers.James@epa.gov>; Hoyt, Daniel <Hoyt.Daniel@epa.gov>; Lannen, Justin <Lannen.Justin@epa.gov>
Subject: RE: Re: Draft statement on Duration of Continuous Air Monitoring Program

Hi James,

Are you still looking for feedback on this? Happy to take a closer look if that would be helpful but just wanted to make sure it hadn't already been finalized.

Provi

Providence Spina
202-564-2722

From: Leathers, James <Leathers.James@epa.gov>
Sent: Thursday, August 27, 2020 8:47 AM
To: Hoyt, Daniel <Hoyt.Daniel@epa.gov>; Lannen, Justin <Lannen.Justin@epa.gov>
Cc: Spina, Providence <Spina.Providence@epa.gov>
Subject: Re: Draft statement on Duration of Continuous Air Monitoring Program

Dan and Justin,

Ex. 5 AC/DP

The purpose of the new Continuous Air Monitoring Program is to improve our ability to identify activities linked to elevated chloroprene concentrations, investigate the root causes of the activities linked to those elevated concentrations, and identify opportunities to further reduce short- and long-term ambient air concentrations of chloroprene. The Continuous Air Monitoring Program is intended to be a short term program, less than one year, that would attempt to capture the full range of operations at the facility as well as any seasonal conditions that could impact monitoring results. For those reasons, the Continuous Air Monitoring Program was deployed in March of 2020 and is planned to operate through the end of December 2020, barring unforeseen circumstances.

Please let me know if you have any comments, edits, or concerns. Thanks

- The purpose of Community Air Monitoring Program conducted since 2016 has been to determine the long-term ambient air concentrations of chloroprene in LaPlace, Louisiana. In addition, the monitoring has served to verify the downward trends in ambient chloroprene concentrations during and after the facility installed emissions controls (e.g., Monomer Vent Project and RTO)
- The Community Air Monitoring Program data over the past year, and also data from Denka's own monitoring network, has shown a steady decline in the average ambient air concentrations of chloroprene, and also a reduction in the frequency of air samples containing "elevated concentrations" of chloroprene. "Elevated concentrations" are concentrations that may, according to EPA's analysis of their magnitude and frequency, cause the long-term ambient air concentration of chloroprene to be over 0.2 µg/m₃.
- The purpose of the new Continuous Air Monitoring Program is to improve our ability to identify activities linked to elevated chloroprene concentrations, investigate the root causes of the activities linked to those elevated concentrations, and identify opportunities to further reduce short- and long-term ambient air concentrations of chloroprene.

James Leathers

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